SAFEGUARDING YOUR FOOD AND DRUG SUPPLY -- No. 43

February 23, 1931

A series of radio talks by W. R. M. Wharton, chief of the eastern district, Food and Drug Administration, U. S. Department of Agriculture, delivered Monday mornings at 10 a.m., Eastern Time, through WJZ, New York, and associated National Broadcasting Company stations.

Good morning, my radio friends. I am your representative of the Federal Food and Drug Administration who comes to you each week to tell you how your foods and drugs are safeguarded through the enforcement of the Federal food and drugs act, and to tell you how to read labels in order that you may become careful, exacting, discriminating, and economical buyers. My friends, most food manufacturers use honest labels, but a few prepare their labels with a definite purpose to mislead you, and the printer's art has developed a method of dissimulation to meet the requirements of all of those who wish to dissemble. You should know the tricks of labeling if your are to become expert label readers and it is my purpose to tell you today about tricky food labels. Trick labels are the result of design, but there are other ofjectionable labels which are the result of ignorance. I am going to tell you about such an astonishing label. It came to my attention in this way. I was visiting a large distributor of food products. This distributor had many private brands. Examining one of his labels, I found on it a statement reading, "Contains Sodium Silicate." I sought out the president of the company and said to him, "My goodness, why do you put sodium silicate in this article?" His reply was, "It's only on the label." Then I said,"Well, why is it on the lable?"--- which elicited the following explanation: "Well," he said, "someone came into my office a short time ago and told me that if I would put 'sodium silicate' on my labels, it would make them look pretty." The advice given meant, of course, that the food distributor could make his labels look shiny if he coated them with water glass, which is sodium silicate. This food distributor gathered up his labels and sent them over to the printer and they came back with the printed legend, "Contains Sodium Silicate." The labels were put into use and the product so labeled went on sale.

Now, if consumers had been reading labels intelligently at that time, they would have refused to buy a single bottle of this manufacturer's "sodium-silicate" labeled product because sodium silicate is water glass and has no place in foods and is never used as an ingredient in foods for any purpose.

This story illustrates a very rare case. Food manufacturers in general know their products so thoroughly and are so conscientiously interested in the sale and quality of their goods that they certainly will not add anything to their labels which would indicate doubtful character of their goods. In fact, the stories of tricky labeling that I am going to tell you today are the exceptions rather than the rule. While we still see deceptive labeling, it is

not nearly so common as it was some years back. The food industry is on a high plane of conscientious and ethical service to the public, but deceptive labeling is still occasionally found and when it is found the Federal Food and Drug Administration takes action to correct it. That is our job as food officials.

Now, let us consider some of the "tricks of labeling foods." Because of the requirements of the Federal food and drugs act and various State Food laws, products which are artificially flavored, many of those which are artificially colored, imitation products, and the like, must be correctly labeled to show the fact. And there are many supplementary statements found on food labels to obviate the possibility that such labels will deceive or mislead the purchasers. Many of the required statements are deemed by the manufacturers to stigmatize their goods and so, while they know that they must make the declarations, they do so as inconspicuously as possible. Hence, you may find such essential statements in small type, in some obscure position on the label, or hidden away in other reading matter. You may find colors and backgrounds used which neatly obscure the statements essential for law compliance and consumer understanding. Again, colors and shadings sometimes almost entirely camouflage the statements of which manufacturers are ashamed. Therefore, my friends, do you not see that you must read labels carefully in order to become discriminating buyers. Let me add that you should look with suspicion on products which are labeled in a manner obviously to hide statements which you have a right to know. There is a great temptation for a manufacturer, who is putting up a 14-ounce package to sell in competition with one which contains one pound, to hide the net-weight statement, "14 ozs" - - but when he does this he has performed a conscious act to mislead, deceive, and defraud you.

It is exceedingly important for the consumer to know the quantity of material in each and every package purchased and the Federal food and drugs act requires that the quantity be stated on the label. Certain manufacturers have practiced various kinds of tricks of labeling to mislead and confuse consumers as to the quantity of food in packages. You are entitled to know the net weight, but manufacturers who wish to hide from you the true facts, sometimes declare weights as "gross weight", or as "gross weight when packed". Sometimes the declaration is made on transparent wrappers of the package so that when you get the package home, unwrap it and examine it, the net-contents statement is unwittingly removed and thrown away. Some manufacturers use decimal fractions in such a way as to be confusing as, for example, ".750 GALLON", which means three quarts if you know how to read it. Statements are also made in terms of drams or grains or cubic centimeters or liters, terms with which you may not be familiar. To illustrate: when a bottle of vanilla extract is labeled 6 drams, as has been done, would you know, off-hand, that the bottle contains only 3/4 of one ounce? Such a declaration is a tricky one, to conceal the fact of the very small quantity in the bottle. Another trick is to display in a show window an advertisement of a product, let us say butter, at such and such a price "per pound". Naturally, when the article advertised is purchased, the consumer expects to get a pound. When this is a trick, unless you read the label, you may never become aware that you really have received only 14 or 15 ounces.

My friends, I want you to get out the old arithmetic and learn your weights and measures tables all over again, and especially weight and measure equivalents. Let me further illustrate the necessity for this. Certain liquid products may be labeled interchangeably in terms of "avoirdupois" and

"liquid" measure. In both of these systems, the term, "ounce" is used. When the term, "ounce", appears alone on a label, it is understood to mean "weight" and when measure is intended, the word, "ounce", is preceded by the word, "fluid". Now a bottle of maple sirup, labeled as containing "8 ounces" or "8 ounces avoirdupois", really contains only six fluid ounces. On the other hand, 70% sugar sirup with a specific gravity of 1.35, may be labeled 11 ounces avoirdupois but will represent only eight fluid ounces, or 1/2 pint. Now do you not see how essential it is to learn to read quantity of contents labels and to know weights and measures equivalents? Some manufacturers have adopted the policy of selling olive oil in cans correctly labeled as containing .98 gallon. The trick is that these .98-gallon cans sell in competition with full-gallon cans. This practice is legal - but deceptive and tricky.

Another trick of labeling is to select a brand name which will give a misleading impression as to the character of the product. Let me illustrate. "Rose Leaf Brand Lard" does not mean leaf lard, a product of higher quality than ordinary lard. "English Brand Mustard" does not necessarily mean that the product is made in England. "Favorite Brand Jam" does not indicate necessarily that the jam is such a favorite that consumers crowd each other to buy it. Brand names serve to identify the products of different manufacturers. They should have no other significance to consumers, therefore, do not misunderstand them.

Still another trick of labeling is to name a product incompletely, thus creating a false impression. For example, "Golden Corn" may be understood by the buyer to be "Golden Bantam Corn" and the label, "White Meat Fish," may be understood by the purchaser to be "White Meat Tuna Fish," unless that buyer reads labels understandingly. While I am on the subject of omissions, let me say that labels generally fail to give you all the information which would aid you to buy intelligently. Omissions are the general rule -- not the kind of omissions I have illustrated -- but omissions which fail to advise as to quality, kind, variety, condition, and relative value. The law does not positively require information of this kind but if a million housewives will demand full labels and back up their demands persistently, the manufacturers of the country can do nothing less than comply and furnish more informatively labeled food products. Are you one of those who are satisfied with things as they are, or do you want more real information on food labels? Another tricky form is to label products with truth-concealing words, such as, "Country Maid Sausage," applied to a product containing beef as well as pork and made in a city packing house.

Tricky coined, made-up, names are used on food labels and these sometimes are grossly misleading. For example, such a name as, "Cherola," when applied to a synthetic artificially colored article, gives the idea of a pure cherry juice beverage, and the name, "Yolkin," conveys the impression that a product, really soya bean lecithin, is egg yolks.

My friends, do not be misled by coined names, but read all the label and see what the product actually is.

Another trick of labeling is to employ designs which give false impressions. Pictures of maple camps may lead the consumer to the conclusion that the product is maple sugar when such is not the case. Pictures of geographical locations may indicate a significance of origin which is not a true one. For example, a design or map of the Bay of Naples may be used on a can of oil and this may be interpreted to indicate the product to be Ital-

ian olive oil when it is neither olive oil nor Italian. Likewise, national colors, pictures of peasants dressed in native costumes, medals, regal crowns, distinctive trees, pictures of fruit and other designs are used to trick the public into a misleading conception of the nature and source of products. Therefore, my friends, read labels carefully.

Still another trick of labeling is to give outstanding prominence to certain words in explanatory material on labels. For example, we may have a product, labeled "Pure Vegetable Oil Flavored with Olive Oil," and the word olive may be the most prominent word on the label, giving the impression on casual reading that the product is olive oil. I had on my desk this morning another label of this kind. Here is what the label said: "John Doe Coffee Co - Roasters of High Grade Coffee - New York." There was nothing else on the label. No name of the product. But the word, "coffee," in the expression, "Roasters of High Grade Coffee," appeared prominently in the middle of the label. This tricky label was designed to make you believe the product ---- actually composed of cereal, chicory, and coffee---- to be pure coffee. My friends, beware of such labels----

Another trick of labeling is to add to the name of a product a word which gives an unwarranted significance to the name. The term, "Natural Tomato Sauce," would ordinarily convey the impression that the product is not artificially colored. Reading the label further we find that artificial color is declared. The term, "Pineapple Hearts," means to the careless label reader a superior kind of canned pineapple and would ordinarily not be expected to describe pineapple cores, but pineapple cores they were found to be when we examined a product so labeled.

There are many statements on labels which must be disregarded by consumers - statements like "best in the world" or"Kelly's Finest Quality," which are just trade puffs and do not mean anything.

Another trick of labeling is to obscure the label in wrapping. I have in mind a certain kind of coffee which was packed in paper bags the necks of which were folded in wrapping. In the folding process the label, showing the product to contain "Added Reasted Peas," was entirely obscured.

Some manufacturers endeavor to persuade the consumer that the food product has some special or health-giving medicinal qualities. My friends, neither labeling, advertising, nor anything that any manufacturer may say about his products can turn a food into a drug. Please remember this when you see such claims.

Still another trick of labeling is to put out two qualities of a product under the identical form of label. You may buy the article and like it and go back for more. The second purchase may contain the lower quality. The grocer must have some way of distinguishing, hence the manufacturer may print one label on a blue background and the other on a yellow background, both with the same wording and style of labeling. The difference in color is the only difference. This form of trick labeling is very rare indeed, but it has happened--- therefore, watch the colors on the labels if you get a product that suits you. Insist on having the same color of label the next time. Still another trick, similar to this, is to apply the same brand name to two different products. For example, a product may be called "Lillian

Brand Coffee" and this brand of coffee will be extensively advertised as pure coffee. The concern will put out both a pure coffee and a compound coffee under "Lillian Brand" with an almost identical label, but the compound will be composed of coffee and chicory. You will have understood from the advertising that "Lillian Brand" of coffee is always pure coffee, but if you read labels you may find a subsidiary label declaring chicory present. Hence, you must read labels, my friends. Continue to read labels-- form the habit of reading all labels over and over again.

Another trick of labeling is to make a statement which implies that a product contains no artificial color or preservative when the product actually does. Such statements may read, "Absolutely No Coal Tar Dyes Used," or "Our Catsup Contains No Boric Acid." Read labels on such products for you may find that they are colored with vegetable colors. Or, you may find that the product is preserved with some other preservative than boric acid.

Another trick is to issue a warning, "Beware of Imitations." When you see such a warning on a label, read carefully to see whether the product itself is an imitation. Manufacturers sometimes make a label statement which inferentially slanders all other brands of the same product--- for example, a statement "The Use of Smith's Candy guarantees to you freedom from talc, fullers earth, or other mineral matter" implies that other candies do contain these ingredients, which is not the truth.

I have given you examples of some of the tricks of labeling foods in order that you may recognize tricky labels. Weigh carefully the significance of all label statements and develop a critical attitude toward labels, such an attitude as will require the label to satisfy you that you are getting what you intend to buy. Now, finally let me warn you to watch out for trick packages -- boxes with false bottoms, bottles with sunken panels, and overlarge slack filled packages. These and other misleading containers may deceive you as to their real capacity.

Practically all forms of trick labeling are in violation of the food and drugs act and literally thousands of prosecutions have been directed against violators who practice these forms of deception. For the most part, such prosecutions have effected corrections, but there are enough such practices still in vogue to justify you, Mrs. Consumer, to be on your guard. Some forms of tricky labeling are not actually <u>illegal</u>, although decidedly unethical. We cannot correct these forms, under the food and drugs act. Careful and persistent label-reading by purchasers may lead manufacturers to correct tricky practices. But in fairness, I want to emphasize the fact that tricky labels are the exception rather than the rule. Indeed, the great majority of food products are honestly branded.

My friends, I have been trying for many weeks to be of constructive help to you by teaching you how to read labels. I am trying with all the seriousness and emphasis that I can command to convince you of the material advantage in learning to read labels. You may become expert label readers, if you wish. All you have to do is to study my read-the-label talks. I have talked on practically all varieties of food and drug products. These talks have been mimeographed and copies of all of them, including the one today, on tricky food labels, are available free for the asking.

Write to W. R. M. Wharton, United States Department of Agriculture, 201 Varick Street, New York City, New York.